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11 CVPARTNERS, INC.

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16 Attorneys for Defendant
17 PATRICIA REDINGTON

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UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

CVPARTNERS, INC., a California
corporation,

Plaintiff,

v.

JEANMARIE BOBEN, an individual;
TYLER HUBBS, an individual; MATT
HINDE, an individual; and PATRICIA
REDINGTON, an individual; ANDY
DUNAYCZAN, an individual; and
DOES 1-15,

Defendants.

No. CV 09 00689 SI

**STIPULATION AND [PROPOSED]
ORDER FOR PERMANENT INJUNCTION
AGAINST PATRICIA REDINGTON**

Plaintiff CVPARTNERS, INC. ("CVPartners" or "Plaintiff") and Defendant
PATRICIA REDINGTON ("Defendant" or "Redington"), by and through their respective
counsel of record (collectively, the "Parties") hereby stipulate and agree to the entry of a

1 permanent injunction against Redington, or any entity or person acting by, through or in
2 concert with her, as follows:

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- 4 1. Requiring Redington to delete any information in her LinkedIn, Facebook,
5 or any other web-based account pertaining to any individual or entity who
6 is known to be a CVPartners Client (defined as an individual or entity
7 seeking to fill a job opening, with whom CVPartners did business or who
8 CVPartners represented during Redington's employment with CVPartners)
9 or CVPartners Candidate (defined as an individual seeking a job with
10 whom CVPartners did business or who CVPartners represented during
11 Redington's employment), except information pertaining to a CVPartners
12 Client or Candidate with whom Redington had a relationship prior to her
13 employment with CVPartners.
- 14 2. Requiring Redington to return, delete, and/or erase, as directed by
15 CVPartners, any CVPartners data or documents stored on any devices
16 capable of storing, transferring or processing data in her possession or
17 control.
- 18 3. Enjoining Redington, for a period of two years from the date her
19 employment with CVPartners terminated, from entering into a partnership
20 with, working with in any capacity, or becoming employed by defendants
21 Jeanmarie Boben, Tyler Hubbs, Matt Hinde, or any entity owned or
22 operated by any or all of said defendants.
- 23 4. Enjoining Redington, for a period of two years from the date her
24 employment with CVPartners terminated, from soliciting or doing business
25 with any individual or entity who was and is known to be a CVPartners
26 Client or Candidate. Redington shall not be enjoined from soliciting or
27 doing business with a CVPartners Client or Candidate with whom
28 Redington had a relationship prior to her employment with CVPartners.

- 1 5. Enjoining Redington from disclosing to any third party or using for herself
2 any information concerning the business or business practices of
3 CVPartners, learned by Redington during her employment with
4 CVPartners, unless express written approval is obtained before such
5 disclosure or use.
- 6 6. Enjoining Redington, for a period of two years from the date her
7 employment with CVPartners terminated, from hiring or causing to be hired
8 any current employee of CVPartners, and from hiring or causing to be hired
9 defendants Jeanmarie Boben, Tyler Hubbs, or Matt Hinde.

10 **IT IS SO STIPULATED** between the Parties.


11 DATED: April 30, 2009

HANSON BRIDGETT LLP

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13 By: 
14 SANDRA L. RAPPAPORT
15 WALTER R. SCHNEIDER
16 Attorneys for Plaintiff
17 CVPARTNERS, INC.

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19 DATED: April 29, 2009

MORGAN, LEWIS & BOCKIUS, LLP

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21 By: 
22 L. JULIUS M. TURMAN
23 Attorneys for Defendant
24 PATRICIA REDINGTON

25 **IT IS SO ORDERED:**

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27 DATED: _____

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 HONORABLE SUSAN ILLSTON
 U.S. District Court Judge